

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MICHELLE FELIX,

Plaintiff,

v.

MARY KAY, INC. and THE MARY
KAY FOUNDATION,

Defendants.

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CIVIL ACTION NO. 3:20-cv-00683-X

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Michelle Felix, Plaintiff in the above-styled and numbered cause ("Plaintiff"), and files this, her Proposed Voir Dire Questions:

1. Do you understand that the jury-selection process is the sole opportunity that the litigants will have to learn if you have had experiences or have feelings or knowledge that may influence how you view the evidence in this case?
2. Have you ever served on a jury? If so, was it civil or criminal? Without disclosing the verdict, did you reach a verdict? Was there anything about your prior jury experience which would make it difficult for you to sit as an impartial juror in this case?
3. Have you ever been involved in a lawsuit as a plaintiff or defendant? If so, was it criminal or civil? Did it go to trial? If so, what was the outcome?
4. Have you ever been a witness in court? If so, under what circumstances?
5. Have you, any of your relatives, or anyone close to you ever studied law?
6. Do any of you have a spouse who is a lawyer or who has studied law?

7. This is a suit about retaliation and fair pay violations to a former employee of Defendants, Mary Kay and The Mary Kay Foundation. Do any of you know anything about the facts of this case either through personal knowledge or the media.

8. Have you or has any member of your family ever held a job in (a) beauty or (b) with either of the Defendants?

9. Does anyone feel as though they, or a friend or a family member, have been mistreated in their workplace environment?

10. Does anyone feel as though they, or a friend or family member, have been mistreated in their workplace or lost a job because of illness, short term, or long term disability?

11. Have you or any member of your family been subjected to harassment in the workplace?

12. Does anyone have specialized training or experience in the areas of Human Resources, personnel, or law?

13. Has anyone sued an employer for money damages?

14. Have you ever been a defendant in a suit brought for damages?

15. Has anyone, or a friend or a family member, had a bad experience with Mary Kay or the Mary Kay Foundation?

16. Have you read any advertisements, articles, or editorials concerning lawsuits or jury awards?

17. Will anyone give deposition testimony less weight than live testimony?

18. Does anyone have strong feelings, good or bad, about employment lawsuits?

19. Does anyone have strong feelings, good or bad, about employment lawsuits?

20. Does anyone have an issue with awarding punitive or exemplary damages if the evidence supported such an award?

Respectfully submitted,

/s/ Ericha R. Brown

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was forwarded via electronic service and/or electronic mail to the following counsel of record on this, the 6th day of March 2023:

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/s/ Ericha R. Brown
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